



APCO International

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS INTERNATIONAL, INC.

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The Honorable Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman:

APCO International supports suggestions that the FCC establish a p-ANI Administrator to facilitate Voice over Internet Protocol (VoIP) E9-1-1 deployment. A p-ANI Administrator is important to address situations where there is no current source of p-ANIs for E9-1-1 purposes. The p-ANI Administrator should issue p-ANIs to VoIP Positioning Centers (VPCs), rather than issuing p-ANIs directly to VoIP Service Providers (VSPs). This will maintain consistency with current p-ANI allocation methods (e.g., in Texas) and avoid potential operational issues. Importantly, p-ANIs should only be available to VSPs (through the VPCs) that remit 9-1-1 service fees as required of traditional telecommunications providers by relevant state and local laws, regulations or rules. Under no circumstances should PSAPs or other government entities be directly or indirectly responsible for the cost of providing p-ANIs.

Finally, we take this opportunity to reiterate our strong support for the Commission's enforcement of its November 28 deadline for VoIP compliance with 9-1-1 and E9-1-1 requirements. In particular, VSPs must not be allowed to sign up new customers in areas in which the VSP cannot comply with the Commission's rules.

Respectfully submitted,

Gregory S. Ballentine
President

cc: The Honorable Michael Copps
The Honorable Jonathan Adelstein
The Honorable Kathleen Abernathy
Thomas J. Navin, Chief, WCB
Daniel Gonzalez, Chief of Staff